

**PAUL VINCENT JOHNSON                     )**  
**and MARY MICHELLE JOHNSON,         )**

V.

**RONALD JOHN RENFER** )  
and **HILL & WILLIAMS BROS., INC.,** )

**No. 3:10-1094**  
**JUDGE NIXON**  
**MAGISTRATE JUDGE GRIFFIN**

## JURY DEMAND

**CASE MANAGEMENT STATEMENT**  
**AND PROPOSED ORDER**

### A. JURISDICTION

## B. PLAINTIFFS' THEORIES AND CLAIMS

1

limited to, medical expenses, hospital bills, loss of earnings, loss of earning capacity, mental and physical pain and suffering, mental anguish and distress, and loss of enjoyment of living. Plaintiff, Mary Michelle Johnson, brings a claim for loss of consortium.

**C. DEFENDANTS' THEORIES AND CLAIMS**

The Defendants, Ronald John Renfer and Hill & Williams Bros., Inc. have admitted fault for the accident. The defendants currently have no information as to the plaintiffs' alleged injuries, and therefore currently do not know the nature and extent of the plaintiffs' injuries, nor whether the claim for injuries are causally related to the motor vehicle. It is the position of Discovery Property & Casualty Insurance Company that it should be dismissed from this case because there was no UM/ UIM coverage applicable in this matter.

**D. ISSUES TO BE DETERMINED**

Plaintiffs seek damages and payment for medical expenses (both past and future) and lost wages due to injuries received in the wreck. Plaintiffs also seek pain and suffering and loss of consortium.

**E. INITIAL DISCLOSURES**

The parties shall exchange initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before March 1, 2011.

**F. DISCOVERY**

The parties shall complete all written discovery and depose all fact witnesses on or before September 1, 2011. Discovery is not stayed during dispositive motions, unless ordered by the Court. No Motions concerning discovery are to be filed until after the parties have conferred in good faith and are unable to resolve their differences, have scheduled and participated in a conference call with Judge Griffin. The deadline for filing discovery related motions is August 1, 2011.

**G. MOTIONS TO AMEND:**

The parties shall file all motions to amend on or before ~~May 1, 2011~~. *May 2, 2011. B*

**H. DISCLOSURE OF EXPERTS:**

The Plaintiff shall identify and disclose all expert witnesses and expert reports on or before June 1, 2011. Defendants shall identify and disclose all expert witnesses and expert reports on or before ~~July 1, 2011~~. *July 15, 2011. B*

**I. DEPOSITIONS OF EXPERT WITNESSES:**

The parties shall depose all expert witnesses on or before August 15, 2011.

**J. JOINT MEDIATION REPORT:**

The parties shall submit a Joint Mediation Report on or before June 1, 2011.

**K. DISPOSITIVE MOTIONS:**

The parties shall file all dispositive motions on or before November 1, 2011.

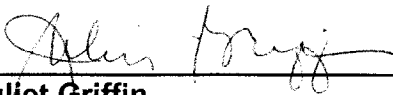
Responses to dispositive motions shall be filed within <sup>21</sup>~~twenty (20)~~ days after service.

Optional replies shall be filed within <sup>14</sup>~~ten (10)~~ days after service of the response. Briefs shall not exceed ~~twenty (20) pages~~. <sup>25 pages.</sup>

**L. ESTIMATED TRIAL TIME:**

The parties expect the trial to last approximately two (2) days.

ENTERED this the \_\_\_\_ day of December, 2010.

  
\_\_\_\_\_  
**Juliet Griffin**  
**U.S. Magistrate Judge**

APPROVED FOR ENTRY:

/s/ John L. Meadows  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing will be served upon the below counsel in this case via the Court's electronic filing system or via U.S. mail, to all parties on the electronic filing receipt, on this the 22<sup>th</sup> day of December, 2010, to:

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/s/ John L. Meadows  
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